

TC

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DOUGLAS GREER

Case No. 09 CR 696

JUDGE NORGLÉ

MAGISTRATE JUDGE MASON

Violations: Title 21, United States Code,
Sections 846 and 841(a)(1); Title 18,
United States Code, Section 2.

COUNT ONE

The SPECIAL SEPTEMBER 2008 GRAND JURY charges:

On or about August 12, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DOUGLAS GREER,

defendant herein, did conspire with others known and unknown to the Grand Jury, knowingly and intentionally to possess with intent to distribute, and to distribute a controlled substance, namely, 5 kilograms or more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

FILED

SEP 09 2009 TC
SEP. 09, 2009
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

COUNT TWO

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges:

On or about August 12, 2009, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DOUGLAS GREER,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 5 kilograms or more of mixtures and substances containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The SPECIAL SEPTEMBER 2008 GRAND JURY further charges that:

1. The allegations of Counts One and Two of the indictment are realleged and fully incorporated herein for the purpose of alleging forfeiture to the United States pursuant to Title 21, United States Code, Section 853.

2. As a result of his violations of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in the foregoing indictment,

DOUGLAS GREER,

defendant herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a): (1) any and all right, title, and interest the defendant may have in any property, real and personal, which constitutes and is derived from proceeds traceable to the offenses as charged in this indictment; and (2) any and all right, title, and interest the defendant may have in any property, real and personal, which was used, and intended to be used, in any manner or part, to commit, and to facilitate the commission of the offenses charged in the indictment.

3. The interests of the defendant, subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853, include, but are not limited to, the following:

a. Approximately \$220,000;

4. If any of the forfeitable property described above, as a result of any act or omission by the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY